

1 RENE L. VALLADARES
2 Federal Public Defender
3 Nevada State Bar No. 11479
4 MARGARET W. LAMBROSE
5 Assistant Federal Public Defender
6 Nevada State Bar No. 11626
7 411 E. Bonneville, Ste. 250
8 Las Vegas, Nevada 89101
9 (702) 388-6577/Phone
10 (702) 388-6261/Fax
11 Maggie_lambrose@fd.org

12 Attorney for Ronald Adams

13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 UNITED STATES OF AMERICA,

16 Plaintiff,

v.

RONALD LAVELL ADAMS,

Defendant.

Case No. 2:17-CR-332-JAD-PAL

**STIPULATION TO CONTINUE
MOTION DEADLINES**
(Second Request)

IT IS HEREBY STIPULATED AND AGREED, by and between Dayle Elieson, United States Attorney, and Elham Roohani, Assistant United States Attorney, counsel for the United States of America, and Rene L. Valladares, Federal Public Defender, and Margaret W. Lambrose, Assistant Federal Public Defender, counsel for Ronald Lavell Adams, that the pretrial motion deadline be continued thirty (30) days.

IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they shall have to and including September 3, 2018, to file any and all pretrial motions and notice of defense, currently due August 2, 2018.

1 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they
2 shall have to and including September 17, 2018, to file any and all responsive pleadings,
3 currently due August 16, 2018.

4 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they
5 shall have to and including September 24, 2018, to file any and all replies to dispositive motions,
6 currently due August 23, 2018.

7 1. Defense counsel is waiting on additional discovery from the government. Thus,
8 defense counsel needs additional time to conduct investigation in this case in order to determine
9 whether there are any pretrial issues that must be litigated and whether the case will ultimately
10 go to trial or will be resolved through negotiations.

11 2. The defendant is incarcerated and does not object to the continuance.

12 3. The parties agree to the continuance.

13 4. The additional time requested herein is not sought for purposes of delay, but
14 merely to allow counsel for defendant sufficient time within which to be able to effectively and
15 complete investigation of the discovery materials provided.

16 5. Additionally, denial of this request for continuance could result in a miscarriage
17 of justice.

18 This is the second stipulation to continue filed herein.

19 DATED this 3rd day of August, 2018.

20 RENE L. VALLADARES
21 Federal Public Defender

DAYLE ELIESON
United States Attorney

22 By /s/ Margaret W. Lambrose
23 MARGARET W. LAMBROSE
24 Assistant Federal Public Defender

By /s/ Elham Roohani
ELHAM ROOHANI
Assistant United States Attorney

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,
Plaintiff,
v.
RONALD LAVELL ADAMS,
Defendant.

Case No. 2:17-CR-332-JAD-PAL

FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER

FINDINGS OF FACT

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. Defense counsel is waiting on additional discovery from the government. Thus, defense counsel needs additional time to conduct investigation in this case in order to determine whether there are any pretrial issues that must be litigated and whether the case will ultimately go to trial or will be resolved through negotiations.

2. The defendant is incarcerated and does not object to the continuance.

3. The parties agree to the continuance.

4. The additional time requested herein is not sought for purposes of delay, but merely to allow counsel for defendant sufficient time within which to be able to effectively and complete investigation of the discovery materials provided.

5. Additionally, denial of this request for continuance could result in a miscarriage of justice.

111

111

ORDER

IT IS THEREFORE ORDERED that the parties herein shall have to and including September 3, 2018 to file any and all pretrial motions and notice of defense.

IT IS FURTHER ORDERED that the parties shall have to and including September 17, 2018 to file any all responses.

IT IS FURTHER ORDERED that the parties shall have to and including September 24, 2018 to file any and all replies.

DATED: 8/7/2018.

Nunc pro tunc: 8/2/2018

UNITED STATES DISTRICT JUDGE